

UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT  
OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ISAIAH LUTHER MERCER,  
a/k/a "LOVEY"

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CRIMINAL NO. 03-19- Erie,

**MOTION FOR CONTINUANCE**

AND NOW, comes the defendant, Isaiah Luther Mercer, by and through his attorney, Gene P. Placidi, Esquire, and files the following Motion for Continuance of his trial date, averring in support thereof as follows:

1. The defendant is charged by Federal Indictment at the above term and number with one count of Possession With Intent to Distribute 50 Grams or More of a "Cocaine Base".
2. The defendant was notified that his trial is scheduled for the March 2006 term of criminal court.
3. The defendant is in continued plea negotiations with the government and is in need of additional time to adequately work out a plea agreement.
4. In addition, undersigned counsel is in need of additional time to adequately prepare a defense on behalf of the defendant in the event that the plea negotiations break down.
5. Christopher Trabold, A.U.S.A. for the Western District of Pennsylvania hereby consents to the trial being continued to the next term of criminal court.

6. Isaiah Luther Mercer, the defendant in the above captioned matter, is aware the next term of criminal court is May, 2006.
7. Understanding that the next term of criminal court is May, 2006, the defendant, Isaiah Luther Mercer, hereby consents to this matter being continued to the next term of court.

**WHEREFORE,** the defendant respectfully requests that the Court enter an Order to continue his trial from the March, 2006 term of court to the May, 2006 term of court.

Respectfully submitted,

BY: /s/Gene P. Placidi  
Gene P. Placidi, Esq.  
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